

APPENDIX H **Sample Response for GPA or NOP**

To

Mr.

City/County of xxxxxxxxx

SUBJECT: Comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the City/County of xxxxxxxxx

Dear Mr/Ms:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for .....

The Alameda County Congestion Management Agency (ACCMA) respectfully submits the following comments:

- The City of xxxxxxxxx adopted Resolution No. .... on ..... establishing guidelines for reviewing the impacts of local land use decisions consistent with the Alameda County Congestion Management Program (CMP). If the proposed project is expected to generate at least 100 p.m. peak hour trips over existing conditions, the CMP Land Use Analysis Program requires the City to conduct a traffic analysis of the project using the Countywide Transportation Demand Model for projection years 2015 and 2035 conditions. Please note the following paragraph as it discusses the responsibility for modeling.
  - The CMA Board amended the CMP on March 26<sup>th</sup>, 1998 so that local jurisdictions are responsible for conducting the model runs themselves or through a consultant. The ACCMA has a Countywide model that is available for this purpose. The City/County of xxxxxxxxx and the ACCMA signed a Countywide Model Agreement on ..... Before the model can be used for this project, a letter must be submitted to the ACCMA requesting use of the model and describing the project. A copy of a sample letter agreement is available upon request.
- Potential impacts of the project on the Metropolitan Transportation System (MTS) need to be addressed. (See 2009 CMP Figures E-2 and E-3 and Figure 2). The DEIR should address all potential impacts of the project on the MTS roadway and transit systems. These include MTS roadways as shown in the attached map as well as BART and AC Transit. Potential impacts of the project must be addressed for 2015 and 2035 conditions.
  - Please note that the ACCMA does *not* have a policy for determining a threshold of significance for Level of Service for the Land Use Analysis Program of the CMP. Professional judgment should be applied to determine the significance of project impacts (Please see chapter 6 of 2009 CMP for more information).
  - For the purposes of CMP Land Use Analysis, 2000 Highway Capacity Manual is used.

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- The adequacy of any project mitigation measures should be discussed. On February 25, 1993, the CMA Board adopted three criteria for evaluating the adequacy of DEIR project mitigation measures:
  - Project mitigation measures must be adequate to sustain CMP service standards for roadways and transit;
  - Project mitigation measures must be fully funded to be considered adequate;
  - Project mitigation measures that rely on state or federal funds directed by or influenced by the CMA must be consistent with the project funding priorities established in the Capital Improvement Program (CIP) section of the CMP or the Regional Transportation Plan (RTP).

The DEIR should include a discussion on the adequacy of proposed mitigation measures relative to these criteria. In particular, the DEIR should detail when proposed roadway or transit route improvements are expected to be completed, how they will be funded, and what would be the effect on LOS if only the funded portions of these projects were assumed to be built prior to project completion.

- Potential impacts of the project on CMP transit levels of service must be analyzed. (See 2009 CMP, Chapter 4). Transit service standards are 15-30 minute headways for bus service and 3.75-15 minute headways for BART during peak hours. The DEIR should address the issue of transit funding as a mitigation measure in the context of the CMA's policies as discussed above.
- The DEIR should also consider demand-related strategies that are designed to reduce the need for new roadway facilities over the long term and to make the most efficient use of existing facilities (see 2009 CMP, Chapter 5). The DEIR should consider the use of TDM measures, in conjunction with roadway and transit improvements, as a means of attaining acceptable levels of service. Whenever possible, mechanisms that encourage ridesharing, flextime, transit, bicycling, telecommuting and other means of reducing peak hour traffic trips should be considered. The Site Design Guidelines Checklist may be useful during the review of the development proposal. A copy of the checklist is enclosed.
- The EIR should consider opportunities to promote countywide bicycle routes identified in the Alameda Countywide Bicycle Plan, which was approved by the ACCMA Board on October 26, 2006. The approved Countywide Bike Plan is available at <http://www.accma.ca.gov/pages/HomeBicyclePlan.aspx>
- The Alameda County Pedestrian Plan, developed by ACTIA, was adopted by both the ACTIA and ACCMA Boards in September 2006 and October 2006, respectively. The EIR should consider opportunities to promote pedestrian improvements identified in the Plan through the project development review process. The approved Countywide Pedestrian Plan is available at <http://www.acta2002.com/>
- For projects adjacent to state roadway facilities, the analysis should address noise impacts of the project. If the analysis finds an impact, then mitigation measures (i.e., soundwalls)

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should be incorporated as part of the conditions of approval of the proposed project. It should not be assumed that federal or state funding is available.

- Local jurisdictions are encouraged to consider a comprehensive Transit Oriented Development (TOD) Program, including environmentally clearing all access improvements necessary to support TOD development as part of the environmental documentation.

Thank you for the opportunity to comment on this Notice of Preparation. Please do not hesitate to contact me at 510.836.2560 if you require additional information.

Sincerely,

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